

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849
Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02-cv-06977
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065
Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279

**DECLARATION OF J. SCOTT TARBUTTON TRANSMITTING EVIDENCE
IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL DEFENDANTS MUSLIM
WORLD LEAGUE AND INTERNATIONAL ISLAMIC RELIEF ORGANIZATION
TO PRODUCE RESPONSIVE DOCUMENTS PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 37(a)**

I, J. Scott Tarbutton affirm, under penalty of perjury, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Motion to Compel Defendants Muslim World League and International Islamic Relief Organization to Produce Responsive Documents Pursuant to Federal Rule of Civil Procedure 37(a).

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' First Set of Requests for Production of Documents Directed to the Muslim World League (October 28, 2005).

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' First Set of Requests for Production of Documents Directed to the International Islamic Relief Organization (December 13, 2005).

4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' Supplemental Requests for Production of Documents Directed to the Muslim World League (April 21, 2006).

5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiffs' Second Set of Supplemental Requests for Production of Documents Directed to Defendant Muslim World League (August 22, 2013).

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' Supplemental Requests for Production of Documents Directed to the International Islamic Relief Organization (April 21, 2006).

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Second Set of Supplemental Requests for Production of Documents Directed to the International Islamic Relief Organization (January 28, 2008).

8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiffs' Third Set of Supplemental Requests for Production of Documents Directed to Defendant International Islamic Relief Organization (March 30, 2012).

9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs' Fourth Set of Supplemental Requests for Production of Documents Directed to Defendant International Islamic Relief Organization (August 22, 2013).

10. Attached hereto as Exhibit 9 is a true and correct copy of a March 14, 2014 letter to Aisha E. Bemby, Esq.

11. Attached hereto as Exhibit 10 is a true and correct copy of a January 25, 2016 letter to Aisha E. Bembry, Esq.

12. Attached hereto as Exhibit 11 is a true and correct copy of an April 22, 2016 letter to Aisha E. Bembry, Esq.

13. Attached hereto as Exhibit 12 is a true and correct copy of an April 28, 2016 letter to Aisha E. Bembry, Esq.

14. Attached hereto as Exhibit 13 is a true and correct copy of an April 7, 2011 letter brief to the Honorable Frank Maas.

15. Attached hereto as Exhibit 14 is a true and correct copy of a July 13, 2011 Hearing Transcript.

16. Attached hereto as Exhibit 15 is a true and correct copy of an Affidavit of Sameer al Radhi, IIRO.

17. Attached hereto as Exhibit 16 is a true and correct copy of an Affirmation of Evan Francois Kohlmann.

18. Attached hereto as Exhibit 17 is a true and correct copy of the Muslim World League Fiqh Council, Resolutions of Islamic Fiqh Council Makkah Mukarramah, From 1st to 18th Sessions, During 1398-1427H (1977-2006).

19. Attached hereto as Exhibit 18 is a true and correct copy of the International Islamic Relief Organization's Executive Committee Meeting Minutes Chart.

20. Attached hereto as Exhibit 19 is a true and correct copy of the International Islamic Relief Organization's Board of Directors Meeting Minutes Chart.

21. Attached hereto as Exhibit 20 is a true and correct copy of the International Islamic Relief Organization's Constituent Council Meeting Minutes Chart.

22. Attached hereto as Exhibit 21 is a true and correct copy of the International Islamic Relief Organization's Overseas Offices Committee Meeting Minutes Chart.

23. Attached hereto as Exhibit 22 is a true and correct copy of a document produced by defendant International Islamic Relief Organization (IIRO112079).

24. Attached hereto as Exhibit 23 is a true and correct copy of an April 12, 2011 Hearing Transcript.

25. Attached hereto as Exhibit 24 is a true and correct copy of a document produced by defendant International Islamic Relief Organization (IIRO120169).

26. Attached hereto as Exhibit 25 is a true and correct copy of the U.S. Department of Treasury designation of Rabita Trust.

27. Attached hereto as Exhibit 26 is a true and correct copy of the U.S. Department of Treasury designation of Al Haramain Al Masjed Al Aqsa.

Executed in Philadelphia, Pennsylvania on December 1, 2017.

/s/_____
J. Scott Tarbutton, Esq.